

(JAB 09/09/09)
SCANNED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION

This Document Relates To:

*Washington State Investment Board vs.
Richard S. Fuld, Jr., et al.*, Civil Action No.
09-cv-06041-LAK

Civil Action No. 09-md-02017-LAK

MOTION TO ADMIT COUNSEL *PRO HAC*
VICE

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Matthew I. Alpert
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Matthew I. Alpert is a member in good standing of the Bar of the State of California, the United States District Courts for the Central and Southern Districts of California, and the Ninth Circuit Court of Appeals. There are no pending disciplinary proceedings against Matthew I. Alpert in any State or Federal court.

DATED: September 2, 2009

Respectfully submitted,

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN



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Melville, NY 11747
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Attorneys for Plaintiff Washington State Investment
Board

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
In re LEHMAN BROTHERS SECURITIES	:	Civil Action No. 09-md-02017-LAK
AND ERISA LITIGATION	:	
_____	:	AFFIDAVIT OF SAMUEL H. RUDMAN IN
	:	SUPPORT OF MOTION TO ADMIT
This Document Relates To:	:	COUNSEL <i>PRO HAC VICE</i>
	:	
<i>Washington State Investment Board vs.</i>	:	
<i>Richard S. Fuld, Jr., et al.,</i> Civil Action No.	:	
09-cv-06041-LAK	:	
_____	X	

SAMUEL H. RUDMAN, being duly sworn, deposes and says as follows:

1. I am a member of Coughlin Stoia Geller Rudman & Robbins LLP, counsel for plaintiff Washington State Investment Board in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Matthew I. Alpert as counsel *pro hac vice* to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Alpert is associated with Coughlin Stoia Geller Rudman & Robbins LLP, in San Diego, California.

4. I have found Mr. Alpert to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am placed to move for the admission of Matthew I. Alpert, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Matthew I. Alpert, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Matthew I. Alpert, *pro hac vice*, to represent plaintiff in the above captioned matter, be granted.

DATED: September 2, 2009



SAMUEL H. RUDMAN



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

August 31, 2009

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MATTHEW ISAAC ALPERT, #238024 was admitted to the practice of law in this state by the Supreme Court of California on November 25, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "J. Robert McPhail".

J. Robert McPhail
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
In re LEHMAN BROTHERS SECURITIES	:	Civil Action No. 09-md-02017-LAK
AND ERISA LITIGATION	:	
_____	:	[PROPOSED] ORDER FOR ADMISSION
	:	<i>PRO HAC VICE</i> ON WRITTEN MOTION
This Document Relates To:	:	
	:	
<i>Washington State Investment Board vs.</i>	:	
<i>Richard S. Fuld, Jr., et al.</i> , Civil Action No.	:	
09-cv-06041-LAK	:	
_____	X	

Upon the motion of Samuel H. Rudman, attorney for plaintiff Washington State Investment Board, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Matthew I. Alpert
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
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San Diego, CA 92101
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619/231-7423 (fax)
E-mail: malpert@csgrr.com

is admitted to practice *pro hac vice* as counsel for plaintiff Washington State Investment Board in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: September __, 2009

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Kelly Stademlann, hereby certify that on September 2, 2009, I caused a true and correct copy of the attached:

Motion To Admit Counsel *Pro Hac Vice*;

Affidavit Of Samuel H. Rudman In Support Of The Motion To Admit Counsel *Pro Hac Vice*; and

[Proposed] Order Granting Motion For Admission *Pro Hac Vice*

to be served by first-class mail to all counsel of record in the current action.


Kelly Stademlann

LEHMAN BONDS WSIB

Service List - 9/2/2009 (09-0088)

Page 1 of 2

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LEHMAN BONDS WSIB

Service List - 9/2/2009 (09-0088)

Page 2 of 2

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